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Carolyn Tatum Roddy Auorney, State Regulatory

February 5, 1998

#### **VIA FED EX**

Mr. David Waddell Executive Director Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243-0505

RE: BellSouth Telecommunications, Inc.'s Entry Into Long Distance

(InterLATA) Service in Tennessee Pursuant to Section 271 of the

Telecommunications Act of 1996

(Docket No. 97-00309)

Dear Mr. Waddell:

Please find enclosed for filing the original and thirteen (13) copies of Comments on How Tennessee Regulatory Authority Should Conduct Technical Workshops and Demonstrations by Sprint Communications Company L.P. in the above-captioned matter.

An extra copy of this transmittal letter is included which I would ask that you please date stamp and return to me for my files in the enclosed self-addressed, stamped envelope

Thank you for your cooperation.

Sincerely,

Carolyn Jatur Roddy
Carolyn Tatum Roddy

CTR:drs

**Enclosures** 

# BEFORE THE TENNESSEE REGULATORY AUTHORITY Nashville, Tennessee 98 FEB 6 AM 10 30

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BellSouth Telecommunications, Inc.'s Entry Into	)
Long Distance (InterLATA) Service in Tennessee	) Docket No. 97-00309
Pursuant to Section 271 of the Telecommunications	
Act of 1996	)

# COMMENTS ON HOW TENNESSEE REGULATORY AUTHORITY SHOULD CONDUCT TECHNICAL WORKSHOPS AND DEMONSTRATIONS

Comes now Sprint Communications Company L.P. ("Sprint") and submits these its Comments on How the Tennessee Regulatory Authority ("TRA") Should Conduct Technical Workshops and Demonstrations in the above-captioned case. The TRA adopted a procedural order in this docket on February 3, 1998, which specifies that a Technical Workshop on Operational Support Systems ("OSS") will be held on March 5-6, 1998, and a Technical Workshop on Performance Measures will be held on March 23-24, 1998. These Comments are filed to provide Sprint's suggestions concerning how the TRA should conduct these technical workshops and demonstrations as follows:

## Technical Workshop - OSS

Sprint requests that the TRA model its OSS Workshop upon the procedures established to investigate the BellSouth Telecommunications, Inc. ("BellSouth") Operational Support Systems in Alabama.

Alabama required BellSouth to demonstrate both the OSS structure that it offers to new entrants and the OSS interfaces it provides internally for its own use. After each of these demonstrations, the workshop participants were given the opportunity to ask BellSouth questions about the systems demonstrated. After both demonstrations and the question-answer period had concluded, each of the parties were given an opportunity to make a statement summarizing their positions on the OSS interfaces demonstrated. Although Alabama initially limited these time periods, these limitations did not seem to be enforced. If a time limit is set, each party should be given a minimum of 15 minutes to ask questions and 30 minutes to summarize their positions. The demonstrations, question-andanswer periods and the statement summaries were recorded by a licensed court reporter. This structure allowed for full participation by all interested parties and allowed the Alabama Public Service Commission to fully examine the OSS interfaces offered to new entrants and to its own employees. Further, it provided participants an opportunity to question BellSouth in an interactive format. Sprint encourages the TRA to adopt a similar comprehensive approach. which will provide all interested parties an opportunity to participate in a meaningful manner.

## **Technical Workshop - Performance Measures**

The TRA should require interested parties to provide proposed performance measures in writing prior to the technical workshop scheduled for March 23-24, 1998. The workshop should be an open forum for interested parties to offer presentations explaining the measurements they propose. If a time limit is established, the parties should be given a minimum of 30 minutes to present their proposed measures. Subject matter experts should be prepared to answer questions posed by the Directors or staff of the TRA. The presentations and question-and-answer period should be recorded by a licensed court reporter.

ACCORDINGLY, Sprint requests the Tennessee Regulatory Authority adopt its suggestions concerning its scheduled Occupational Support Systems Technical Workshop and the Technical Workshop on Performance Measures.

Respectfully submitted,

Sprint Communications Company L.P.

Carolyn Tatum Roddy

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#### **CERTIFICATION OF SERVICE**

I hereby certify that I have this day served a true and exact copy of the within and foregoing Comments on How Tennessee Regulatory Authority Should Conduct Technical Workshops and Demonstrations by Sprint Communications Company L.P. in Docket No. 97-00309, via United States mail, postage paid and properly addressed to the following:

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This the 5th day of February, 1998

Carolyn Tatum Roddy

Sprint Communications Company L.P.

**External Affairs**